# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

AMPEX CORPORATION,	)
Plaintiff,	)
v.	) C.A. No. 04-1373-KAJ
EASTMAN KODAK COMPANY, ALTEK CORPORATION and CHINON INDUSTRIES, INC.,	REDACTED
Defendants.	) )

APPENDIX TO DEFENDANTS' ANSWERING BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT THAT U.S. PATENT NO. 4,802,019 IS NOT PRIOR ART TO U.S. PATENT NO. 4,821,121

#### OF COUNSEL:

William F. Lee Michael J. Summersgill WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000 Fax: (617) 526-5000

S. Calvin Walden Rebecca M. McCloskey WILMER CUTLER PICKERING HALE AND DORR LLP 399 Park Avenue New York, NY 10022 Tel: (212) 230-8800 Fax: (212) 230-8888

Date: June 13, 2006

Collins J. Seitz, Jr. (Bar No. 2237) Jaclyn Mason (Bar No. 4737) Connolly Bove Lodge & Hutz LLP 1007 North Orange Street PO Box 2207 Wilmington, Delaware 19899-2207 Tel: (302) 888-6241

Attorneys for Defendants Eastman Kodak Company and Altek Corporation Case 1:04-cv-01373-KAJ Document 384 Filed 06/19/2006 Page 2 of 11

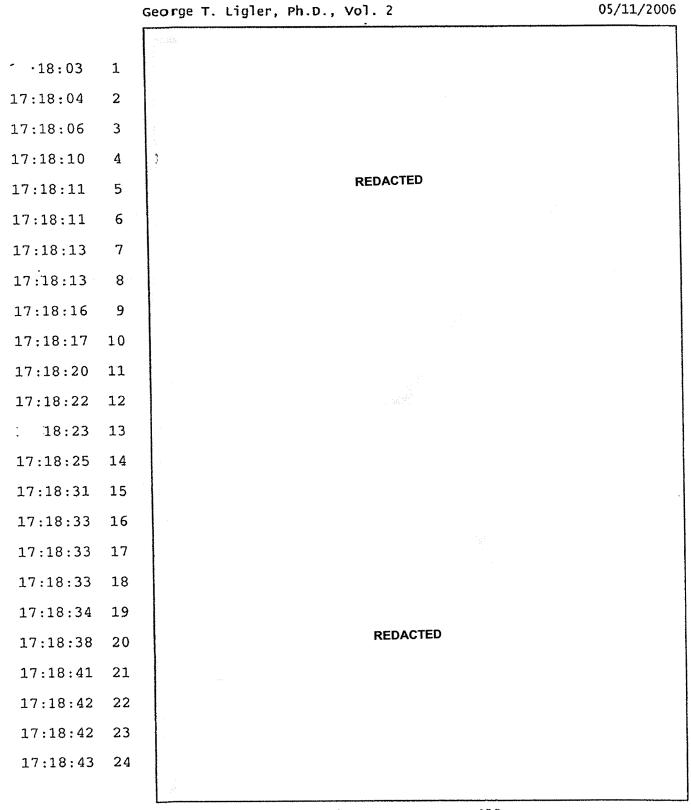
## **Table of Contents**

<u>Pa</u>	ge
5/11/06, selected pages of the deposition transcript of Dr. George T. LiglerB	3-1

George T. Ligler, Ph.D., Vol. 2

05/11/2006

```
342
1
               IN THE UNITED STATES DISTRICT COURT
2
                  FOR THE DISTRICT OF DELAWARE
3
4
      AMPEX CORPORATION,
5
                          Plaintiff, )
                                       ) C.A. No.
6
             v.
      EASTMAN KODAK COMPANY, et al., ) 04-1373 (KAJ)
7
8
                          Defendants. )
 9
                                          CERTIFIED ORIGINAL
                                          LEGALINK BOSTON
10
11
                    Videotaped Deposition of
12
13
                     GEORGE T. LIGLER, Ph.D.
14
                        Washington, D.C.
15
                     Thursday, May 11, 2006
16
                            9:38 a.m.
17
18
19
... \.
21
22
     Job No.: 22-77797
23
     Pages 342 - 651, Volume 2
     Reported By: Joan V. Cain
24
```



		George T. Ligler, Ph.D., Vol. 2	05/11/2006
7:18:49	1		
17:18:50	2		
17:18:53	3		
17:18:56	4		
17:18:56	5	REDACTED	÷
17:18:58	6	1 7 -	
17:19:04	7		
17:19:04	8		
17:19:08	9		
17:19:12	10		
17:19:19	11		
17:19:22	12		
19:26	13		
17:19:27	14	**	
17:19:27	15		
17:19:32	16		
17:19:35	17	REDACTED	
	18		
17:19:37	19		
17:19:38	20		
17:19:38	21		
17:19:39	22		
17:19:43	23		
17:19:43	24		

		George T. Ligler, Ph.D., Vol. 2	05/11/2006
19:46	1	<i>*</i>	
17:19:50	2		
17:19:55	3	REDACTED	
17:19:57	4		
17:19:58	5		
17:20:02	6		
17:20:05	7	,	
17:20:06	8		i
17:20:06	9		
17:20:11	10		
17:20:15	11		
17:20:17	12		
20:17	13		
17:20:20	14		
17:20:22	15		
17:20:23	16		
17:20:25	17	REDACTED	
	18		
17:20:26	19		
17:20:28	20		
17:20:31	21		
17:20:34	22	•	
17:20:47	23		
17:20:49	24		
			**************************************

LegaLink Boston, a Merrill Company (617) 542-0039

		George T. Ligler, Ph.D., Vol. 2	05/11/2006
:20:52	1		
17:20:53	2		
17:20:54	3		
17:20:58	4		
17:21:00	5	REDACTED	
17:21:02	6		
17:21:05	7		
17:21:07	8		
17:21:07	9		
17:21:11	10		
17:21:14	11		
17:21:19	12		
21:20	13		
17:21:22	14		
17:21:25	15		
17:21:28	16		
17:21:30	17		
17:21:31	18	REDACTED	
17:21:32	19		
17:21:34	20		
17:21:37	21		
17:21:40	22		
17:21:42	23		
17:21:42	24		
		) and july Danton or Manaill Comm	

		George T. Ligler, Ph.D., Vol. 2	05/11/2006
33:02	1		- Registration of the second o
17:33:06	2		
17:33:08	3		
17:33:10	4	REDACTED	
17:33:10	5	REDACTED	
17:33:13	6		
17:33:14	7		
17:33:15	8		
17:33:17	9		
17:33:18	10		
17:33:21	11	· ·	
17:33:32	12		
. 33:34	13		
17:33:37	14		
17:33:42	15		
17:33:42	16		
17:33:43	17	REDACTED	
17:33:44	18		
17:33:45	19		
17:33:46	20		
17:33:51	21		
17:33:58	22		
17:34:03	23		
17:34:05	24		
•			

		George T. Ligler, Ph.D., Vol. 2	05/11/2006
:34:13	1		·
17:34:16	2		
17:34:20	3		
17:34:23	4	REDACTED	
17:34:27	5		
17:34:31	6		
17:34:34	7		
17:34:36	8		
17:34:39	9		
17:34:42	10		
17:34:43	11		
17:34:46	12		
. 34:47	13		
17:34:50	14		
17:34:53	15		
17:34:56	16		
17:35:03	17	REDACTED	
17:35:10	18		
17:35:12	19		
17:35:15	20		
17:35:17	21		
17:35:18	22		
17:35:21	23		
17:35:32	24		
		togalink poetan a Manuill campa	

17:49:10 24

LegaLink Boston, a Merrill Company (617) 542-0039

#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2006, I electronically filed the Redacted Appendix to Defendants' Answering Brief in Opposition to Ampex Corporation's Motion for Summary Judgment that U.S. Patent No. 4,802,019 is Not Prior Art to U.S. Patent No. 4,821,121 with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Jack B. Blumenfeld, Esquire Julia Heaney, Esquire Morris, Nichols, Arsht & Tunnell 1201 N. Market Street P.O. Box 1347 Wilmington, Delaware 19899

and that I caused copies to be served upon the following in the manner indicated:

#### **VIA E-MAIL**

Jesse J. Jenner, Esquire Ropes & Gray LLP 1251 Avenue of the Americas New York, NY 10020

#### VIA E-MAIL & FEDERAL EXPRESS

Norman H. Beamer, Esquire Ropes & Gray LLP 525 University Avenue Palo Alto, CA 94301

### VIA E-MAIL & HAND DELIVERY

Jack B. Blumenfeld, Esquire Julia Heaney, Esquire Morris, Nichols, Arsht & Tunnell 1201 N. Market Street P.O. Box 1347 Wilmington, Delaware 19899

/s/ Collins J. Seitz, Jr.

Collins J. Seitz, Jr. (Bar No. 2237) Connolly Bove Lodge & Hutz LLP P.O. Box 2207 1007 North Orange Street Wilmington, DE 19899